

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	Case No. 23-90907 (CML)
	§	
STRATEGIC MATERIALS, INC., <i>et al.</i>	§	(Chapter 11)
DEBTORS. ¹	§	
	§	(Jointly Administered)

**FORD MOTOR CREDIT COMPANY LLC also known as CAB EAST, LLC’S
LIMITED OBJECTION TO CONFIRMATION OF JOINT PRE-PACKAGED PLAN**

FORD MOTOR CREDIT COMPANY LLC, also known as CAB EAST, LLC (“Ford Credit”) files this Limited Objection to Confirmation of Joint Pre-Packaged Plan (“Plan”) and in support states as follows:

1. Ford Credit and Debtor RIPPLE GLASS, LLC (“Ripple”) are parties to a Master Commercial Lease Agreement (“Lease Agreement”) as reflected in the Proof of Claim filed in this case on December 12, 2023 by Ford Credit. [Claim # 5-1] As stated therein, holds a claim in the amount of \$10,710.54 for charges related to the lease of a motor vehicle described as a 2019 Ford F-450 bearing vehicle identification number 1FD0X4HT3KEF12970 (the “Leased Vehicle”). The Plan does not specify Ripple Glass’s intentions with respect to the Leased Vehicle which remains in possession of Ripple Glass.

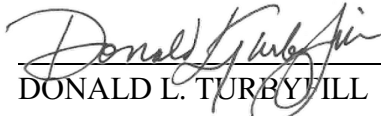
2. As of January 10, 2024, there are 9 monthly installment payments remaining on the Lease Agreement in the amount of \$1,185.97 per month. The monthly installment payments due for

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Strategic Materials, Inc. (7116); SMI Group Ultimate Holdings, Inc. (5043); SMI Topco Holdings, Inc. (6850); SMI Group Holdings, LLC (9607); SMI Group Acquisitions, Inc. (9072); Strategic Materials Holding Corp. (4439); American Specialty Glass, Inc. (0993); Container Recycling Alliance, LLC (7719); SMI Reflective Recycling NE HoldCo, LLC (3065); SMI Reflective Recycling HoldCo, LLC (3541); SMI Reflective Industries HoldCo, LLC (3374); SMI Equipment, Inc. (2735); SMI Nutmeg HoldCo, LLC (4526); SMI BevCon HoldCo, LLC (6158); Ripple Glass, LLC (1936); and NexCycle, Inc. (9109). The location of the Debtors’ U.S. corporate headquarters and the Debtors’ service address is: 17220 Katy Freeway, Ste. 150, Houston, TX 77094.

November 11, 2023 and December 11, 2023 remain unpaid, and there is presently a total past due in the amount of \$2,409.87.

WHEREFORE, Ford Credit respectfully request that the Court consider this Limited Objection and grant further relief as may be just and proper.

Respectfully submitted,



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AND PARTY-IN-INTEREST
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all parties that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the ECF procedures in this District on January 10, 2024.


DONALD L. TURBYFILL